

**PUBLIC CONSULTATION ISSUED BY THE INFO-COMMUNICATION
MEDIA DEVELOPMENT AUTHORITY**

ON

PROPOSED ALLOCATION OF 6 GHZ BAND IN SINGAPORE



Consultation Submission by M1 Limited

14 March 2023

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Introduction

1. M1, a subsidiary of Keppel Corporation, is Singapore's first digital network operator, providing a suite of communications services, including mobile, fixed line and fibre offerings, to over two million customers. Since the launch of commercial services in 1997, we have achieved many firsts – becoming one of the first operators to be awarded one of Singapore's two nationwide 5G standalone network license, first operator to offer nationwide 4G service, as well as ultra high-speed fixed broadband, fixed voice and other services on the Next Generation Nationwide Broadband Network (NGNBN).
2. M1 welcomes the opportunity to review and submit our comments to the IMDA's public consultation on "Proposed Allocation Of 6 GHz Band In Singapore" ("Consultation").
3. M1's views on the IMDA's Consultation are set out below.

M1's views on IMDA's Consultation

4. IMDA has proposed to allocate the lower 6 GHz band (i.e. 5,925 MHz – 6,425 MHz) for RLAN / Wi-Fi use for a start, in light of the considerations stated in the Consultation. We wish to highlight that the mid-band spectrum in Singapore is also vital to support the growing demand for 5G mobile services in future. Therefore, there is a competing demand for the 6 GHz band between Wi-Fi and 5G mobile services.
5. In Singapore, the mobile network operators have achieved at least 95% of 5G nationwide outdoor coverage, a pace much faster than many overseas countries. The mobile network operators are also driving the development and adoption of 5G mobile services and applications in the consumer and enterprise markets.
6. IMDA would be aware that the supply of mid-band spectrum in Singapore for future mobile services is limited. We are of the view that the 6 GHz band represents the most viable option for the expansion of 5G mobile services. The availability of 6 GHz band will be important to support the next phase of 5G development, given that the latter also plays a crucial role to Singapore's digital economy.
7. We would caution that if additional mid-band spectrum is not made available, it will result in mobile network operators having to significantly densify their network deployment across many site locations. Such an approach is simply not economically viable and practical. In Singapore, the challenges are further compounded by the fact that we face physical space constraints and competing demands for sites from other parties. Massive deployment will also result in interference and performance degradation, and is not a sustainable practice in view of increasing expectations for organisations to reduce their carbon footprint.



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8. As IMDA attempts to address the domestic demand for Wi-Fi, we believe that IMDA should set aside the upper 6 GHz band (6425-7125 MHz) for future 5G mobile services expansion, for the reasons stated above. This strikes a balance in addressing the needs for Wi-Fi and supporting future 5G development.